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FILED
U.S. DISTRICT COURT

2019 FEB 14 3:14 PM
SEALED
DISTRICT OF UTAH

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

WILLIAM JONES,

Defendant.

INDICTMENT

18 U.S.C. § 2251(a) and (e),
PRODUCTION OF CHILD
PORNOGRAPHY (Count I);
18 U.S.C. § 2252A(a)(5)(B),
POSSESSION OF CHILD
PORNOGRAPHY (Count II),
18 U.S.C. § 2422(b), COERCION AND
ENTICEMENT (Count III).

Case: 2:18-cr-00075

Assigned To : Parrish, Jill N.

Assign. Date : 2/7/2018

Description:

The Grand Jury Charges:

COUNT I

Production of Child Pornography
(18 U.S.C. § 2251(a) and (e))

Between December, 2016, and March, 2017, in the Central Division of the District
of Utah,

WILLIAM JONES,

the defendant herein, did knowingly employ, use, persuade, induce, entice and coerce a
minor to engage in sexually explicit conduct for the purpose of producing visual

depictions of such conduct, and the defendant, WILLIAM JONES, knew and had reason to know such visual depictions would be transported across state lines and in foreign commerce, by any means including the internet, and which visual depictions were mailed and transported across state lines and in foreign commerce, by any means including the internet, and such visual depictions were produced using materials that had been mailed, shipped, and transported across state lines and in foreign commerce by any means, and attempted to do so; all in violation of 18 U.S.C. § 2251(a) and (e).

COUNT II

Possession of Child Pornography
(18 U.S.C. § 2252A(a)(5)(B))

On a date unknown, continuing through March, 2017, in the Central Division of the District of Utah,

WILLIAM JONES,

defendant herein, did knowingly possess any material which contains an image of child pornography, as defined in 18 U.S.C. § 2256(8), that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, and which images were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, including by computer, and attempted to do so; all in violation of 18 U.S.C. § 2252A(a)(5)(B).

COUNT III
Coercion and Enticement
(18 U.S.C. § 2422(b))

Between, October, 2016 and March, 2017, in the Central Division of the District
of Utah,

WILLIAM JONES,

using a facility or means of interstate or foreign commerce, did knowingly persuade,
induce, entice, and coerce any individual who has not attained the age of 18 years, to
engage in any sexual activity for which any person can be charged with a criminal
offense, and attempted to do so; all in violation of 18 U.S.C. § 2422(b).

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

Pursuant to 18 U.S.C. § 2253, upon conviction of a violation of 18 U.S.C. §§ 2251
or 2252A, as alleged in Counts I and II of this Indictment, the above-named defendant
shall forfeit to the United States, (i) any visual depiction described in 2251, 2251A, or
2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film,
videotape, or other matter which contains any such visual depiction, which was produced,
transported, mailed, shipped, or received in violation of this chapter; (ii) any property,
real or personal, constituting or traceable to gross profits or other proceeds obtained from
such offense; and (iii) any property, real or personal, used or intended to be used to
commit or to promote the commission of such offense or any property traceable to such

property. The property to be forfeited includes, but is not limited to, the following:

- Android cell phone

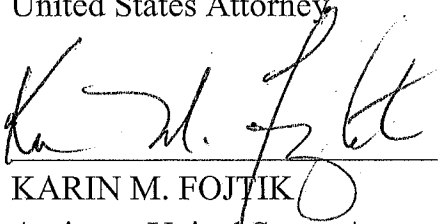
A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

JOHN W. HUBER

United States Attorney



KARIN M. FOJTIC

Assistant United States Attorney